

**REDACTED - FOR PUBLIC INSPECTION**

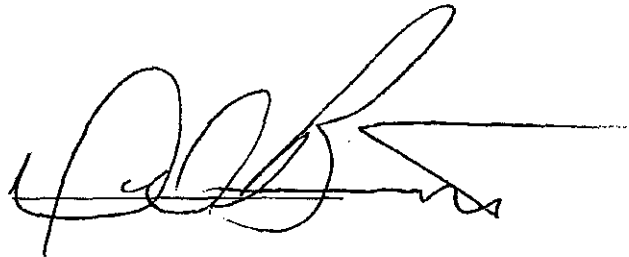
provisioning loops even in the rare instance where it may be economically feasible to make the initial investment to serve a particular premise.

4. Integra has a preference to obtain facilities from competitive providers whenever it is economically infeasible for Integra to construct facilities. Integra purchases services from ILECs only as a last alternative. However, it is my experience in every market in which it operates that Integra is rarely able to obtain raw copper facilities or DS0, DS1 and DS3 level access from competitors. Integra must obtain facilities from ILECs either as UNEs or special access where it is unable to construct facilities, or obtain them from competitors.

5. ILEC special access and "commercial" offerings do not provide a realistic business alternative for obtaining most transport and loop facilities for the reasons stated in Integra's recent comments in WC Docket No. 05-25.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed August 30 2007

A handwritten signature in black ink, appearing to be 'J. D. K.', with a long horizontal line extending to the right.



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**Affinity, Cavalier, CP Telecom  
Globalcom, McLeodUSA, Integra, TDS  
WC Docket No. 07-97  
August 31, 2007**

**ATTACHMENT 4**

**SECOND DECLARATION OF GEOFFREY WILLIAMS, INTEGRA TELECOM, INC.**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20054

In the Matter of	)	
	)	
Petitions of Qwest Corporation	)	
for Forbearance Pursuant to 47 U.S.C. § 160(c)	)	WC Docket No. 07-97
in the Denver, Minneapolis-St. Paul, Phoenix and	)	
Seattle Metropolitan Statistical Areas	)	

**SECOND DECLARATION OF GEOFFREY WILLIAMS**

1. My name is Geoffrey Williams. I am a Product Manager and Developer of Integra Telecom, Inc. ("Integra"). My business address is 1201 Lloyd Blvd, Portland, Oregon, 97232. I joined Integra in October 1995 through the acquisition of Electric Lightwave. I have more than 28 years experience in telecommunications design, development, sales, and operational support. I have factual knowledge relating to the information discussed in this Declaration. The purpose of this Declaration is to describe a recent study of customer churn conducted by Integra.

2. Integra surveyed customers that between July 2006 through June 2007 had switched to other providers. The customers were in six states in which Integra operates including Minnesota and Washington. While the greater Phoenix Arizona MSA is now served by Integra, we omitted it from this research because it is a very new market to Integra and we are still doing market analysis and network re-configuration that would make a churn analysis skewed.

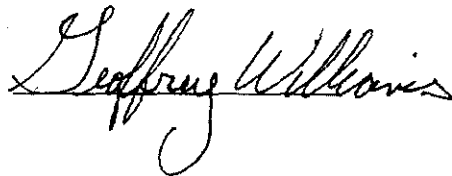
3. The results of the survey show that of those customers who switched from Integra to another telecommunications provider and for whom Integra was able to identify the new

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provider, only approximately 12% switched to a cable operator. Approximately 81% switched to an ILEC or to a another CLEC that, to the best of my information and belief, uses ILEC whole-sale facilities. The survey also showed one of the lowest churn rates in the industry and high customer satisfaction with Integra's services.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed August 31, 2007

A handwritten signature in cursive script, appearing to read "Geoffrey Wilkerson", written over a horizontal line.